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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

JOSE SOTELO, individually,  
Plaintiff,

vs.

STATE FARM FIRE AND CASUALTY  
COMPANY, and DOES I through, and ROE  
CORPORATIONS XI through XX, inclusive,  
Defendant.

CASE NO.: 2:23-cv-01541-MMD-DJA

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY (Third Request)**

Plaintiff, JOSE SOTELO (“Plaintiff”), by and through his attorneys of record, ANGULO LAW GROUP, and Defendant, STATE FARM FIRE AND CASUALTY COMPANY (“Defendant”), by and through its attorneys of record, HARPER | SELIM, (collectively, “the Parties”) submit the following Stipulation and proposed Order pursuant to LR 26-3 hereby agreeing to a sixty (60) day continuance (third request) of the current discovery deadline to give the parties additional time to facilitate resolution of the parties’ pending discovery dispute regarding State Farm’s disclosure of confidential information (ECF No. 22) that impacts the Plaintiff’s noticed Rule 30(b)(6) deposition topics and State Farm’s responses to Plaintiff’s written discovery. The additional time is necessary so as not to prejudice the parties’ expert witnesses and the disclosure of their respective expert’s initial reports.

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**I. STATEMENT OF DISCOVERY COMPLETED TO DATE**

1. The Parties participated in the Rule 26(f) conference on November 3, 2023.
2. Plaintiff has served his Initial Disclosure of Documents and Witnesses and 12 Supplements.
3. Defendant has served its Initial Disclosure of Documents and Witnesses and 2 Supplements.
4. Defendant has served its Designation of Expert Witnesses.
5. Plaintiff has propounded initial written discovery on Defendant and Defendant responded; however, Defendant has withheld disclosure of additional confidential information pending a protective order.
6. Defendant has propounded initial written discovery on Plaintiff and Plaintiff responded; however, Plaintiff's responses require supplemental responses following the parties' meet-and-confer on June 18, 2024.
7. Defendant has completed a Fed. R. Civ. P. 35 physical examination of Plaintiff.
8. The depositions of three of State Farm's claim personnel have been completed.
9. Plaintiff has noticed the Deposition of State Farm's Rule 30(b)(6) witness(es); however, the deposition topics broach subjects and documents that are subject to a protective order.

**II. STATEMENT OF DISCOVERY THAT NEEDS TO BE COMPLETED**

1. Disclosure of confidential information subject to protective order.
2. Deposition of State Farm's Rule 30(b)(6) witness(es).
3. Deposition of the Plaintiff.
4. Initial Expert Disclosures.
5. Rebuttal Expert Disclosures.
6. Expert witness depositions.
7. Depositions of Plaintiff's treating physicians.
8. Supplemental and additional written discovery.

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**III. REASONS WHY DISCOVERY SHOULD BE EXTENDED**

The parties are anticipating the Court's resolution of a pending discovery dispute regarding State Farm's disclosure of confidential information (ECF No. 22) that impacts the Plaintiff's noticed Rule 30(b)(6) deposition topics. The Rule 30(b)(6) topics, also, broach subjects and documents that are subject to protection. Following the entry of a protective order, the deposition of State Farm's Rule 30(b)(6) witness will be rescheduled to a time that will permit both (1) Defendant's timely disclosure of confidential information, and (2) Defendant's supplemental responses to Plaintiff's written discovery. Additional time will assist the parties' expert witnesses and the disclosure of their respective expert's initial reports and facilitate the resolution of the parties' discovery disputes. The parties are, therefore, seeking a ninety (60) day continuance of the current discovery deadline to complete the remaining discovery. The extension is not to harass or delay proceedings.

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**IV. PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY**

It is hereby stipulated that the discovery cutoff deadline be extended for a period of sixty (60) days. If approved, the new discovery deadline would be modified as follows:

<b>Task</b>	<b>Current Deadline</b>	<b>Proposed Deadline</b>
Last day to amend pleadings and add parties	Closed	Closed
Last day to disclose initial experts and reports	July 24, 2024	September 23, 2024 <sup>1</sup>
Last day to disclose rebuttal experts and reports	August 26, 2024	October 25, 2024
Discovery cutoff	September 23, 2024	November 22, 2024
Last day to file dispositive motions	October 22, 2024	December 23, 2024 <sup>2</sup>
Pre-Trial order	November 25, 2024	January 24, 2025

DATED this 28<sup>th</sup> day of June 2024.

**ANGULO LAW GROUP**

*/s/ Peter M. Angulo*

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DATED this 28<sup>th</sup> day of June 2024.

**HARPER | SELIM**

*/s/ James E. Harper*

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**ORDER**

IT IS SO ORDERED.

DATED: 7/1/2024



UNITED STATES MAGISTRATE JUDGE

<sup>1</sup> This deadline falls on Sunday, September 22, 2024. As a result, this deadline extends to the next court day of Monday, September 23, 2024, by operation of NRCP 6.

<sup>2</sup> This deadline falls on Saturday, December 21, 2024. As a result, this deadline extends to the next court day of Monday, December 23, 2024, by operation of NRCP 6.